



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

RQ-2

Michael L. Retzer, Treasurer
Republican National Committee
310 First Street SE
Washington, DC 20003

APR 30 2003

Identification Number: C00003418

Reference: Amended 2002 June Monthly Report (5/1/02-5/31/02), received 7/10/02

Dear Mr. Retzer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B supporting Line 22 (pertinent portion(s) attached) discloses \$17,568.07 in transfers to RNSEC Limited Corporate, which appears to be a non-federal account. You are advised that 11 CFR §102.5 prohibits a non-federal account from financing activity in connection with federal elections. Please provide clarifying information regarding these transactions including the date(s) when the original activity was conducted by the non-federal account. In addition, if any of the disbursements disclosed were made to influence the election or defeat of specific federal candidates, the disbursements should be allocated accordingly and disclosed as either in-kind contributions on Schedule B supporting Line 23, independent expenditures on Schedule E supporting Line 24, or as coordinated expenditures on Schedule F supporting Line 25. 11 CFR §§104.3(b)(3) and 106.1

Although the Commission may initiate legal action regarding the activities conducted by your non-federal account, any clarifying information that you can provide will be taken into consideration.

-Schedule H4 discloses disbursements for E, G, K, M, P, S, and T which are categorized as Fundraising; however, Schedule H2 does not include the allocation ratios for this activity. Please amend Schedule H2 to disclose the omitted ratios.

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-Schedule H2 of your report indicates that your committee participated in E4, M4, P4, S4, T4, G4, E5, G5, M5, P5, S5, T5, M3, and T3 activities or events during the reporting period. However, there are no corresponding disbursements reflected on your Schedule H4. Note that you need not include activities on Schedule H2 if there are no corresponding payments made for the activity during the reporting period. If any disbursements were incorrectly reported, you should file an amended Schedule H4 with the correct unique identifying code or title, or provide clarifying information regarding the activities on Schedule H2.

-Please clarify all expenditures made for BROADCAST SVS, VIDEO, MEDIA SVS, VIDEO SVS, and PRODUCTION COST on Schedule(s) B and H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B, E, or F supporting Lines 23, 24, or 25 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) B and H4 of your report to clarify the following description(s): TRANS. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Please amend your report by providing the purpose for the disbursement to the Federal Express Corporation itemized on Schedule H4 supporting Line 21(a).

-Line 1 and Line 5 of your Schedule I for your Republican National State Election Committee Non-Federal account discloses \$9,560,221.40 in receipts and \$242,870.89 in disbursements, respectively. However, the sum of the memo entries itemized on memo Schedule A equal \$9,546,819.27 and the sum of the memo entries itemized on memo Schedule B equal \$241,545.96. Please clarify these apparent discrepancies.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at

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the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Scott Walker
Senior Campaign Finance Analyst
Reports Analysis Division

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**SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category on the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 4122/4433

<input type="checkbox"/> 21b	<input checked="" type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 24	<input type="checkbox"/> 25
<input type="checkbox"/> 26	<input type="checkbox"/> 27	<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 29

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of securing contributions or for commercial purposes, either then or later, the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)

REPUBLICAN NATIONAL COMMITTEE

Full Name (Last, First, Middle Initial)

A. NORTH DAKOTA REPUBLICAN PARTY

Mailing Address

PO BOX 1917

City

BISMARCK

State

ND

Zip Code

58502

Purpose of Disbursement

TRANSFER

Candidate Name

Category/
Type

Office Sought

House

Senate

President

Disbursement For:

☒ Primary

General

Other (specify) _____

State:

District:

Date of Disbursement

05 / 01 / 2002

Amount of Each Disbursement this Period

1772.00

Transaction ID: L2290108311263

Full Name (Last, First, Middle Initial)

B. RUNSEC LIMITED CORPORATE

Mailing Address

210 FIRST STREET SE

City

WASHINGTON

State

DC

Zip Code

20005

Purpose of Disbursement

TRANSFER

Candidate Name

Category/
Type

Office Sought:

House

Senate

President

Disbursement For:

☒ Primary

General

Other (specify) _____

State:

District:

Date of Disbursement

05 / 30 / 2002

Amount of Each Disbursement this Period

17568.07

Transaction ID: L2290108311589

Full Name (Last, First, Middle Initial)

C. SC GOP

Mailing Address

1508 LADY ST.

City

COLUMBIA

State

SC

Zip Code

29201

Purpose of Disbursement

TRANSFER

Candidate Name

Category/
Type

Office Sought

House

Senate

President

Disbursement For:

☒ Primary

General

Other (specify) _____

State:

District:

Date of Disbursement

05 / 06 / 2002

Amount of Each Disbursement this Period

25000.00

Transaction ID: L2290108311818

SUBTOTAL of Disbursements This Page (optional)

50346.07

TOTAL This Period (final page; this line number only)

FEC Schedule B

(Revised 1/2001)

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